IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ARCONIC INC.,

: CIVIL ACTION NO. 2:17-cv-1434-JFC

Plaintiff,

:

VS.

:

NOVELIS INC.,

:

and

:

NOVELIS CORP.,

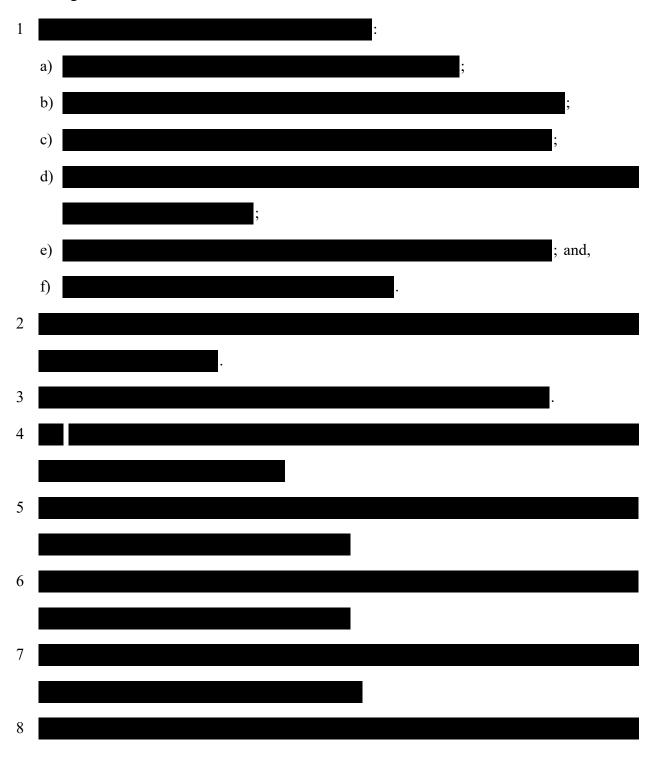
:

Defendants. :

ARCONIC'S TRADE SECRET IDENTIFICATION

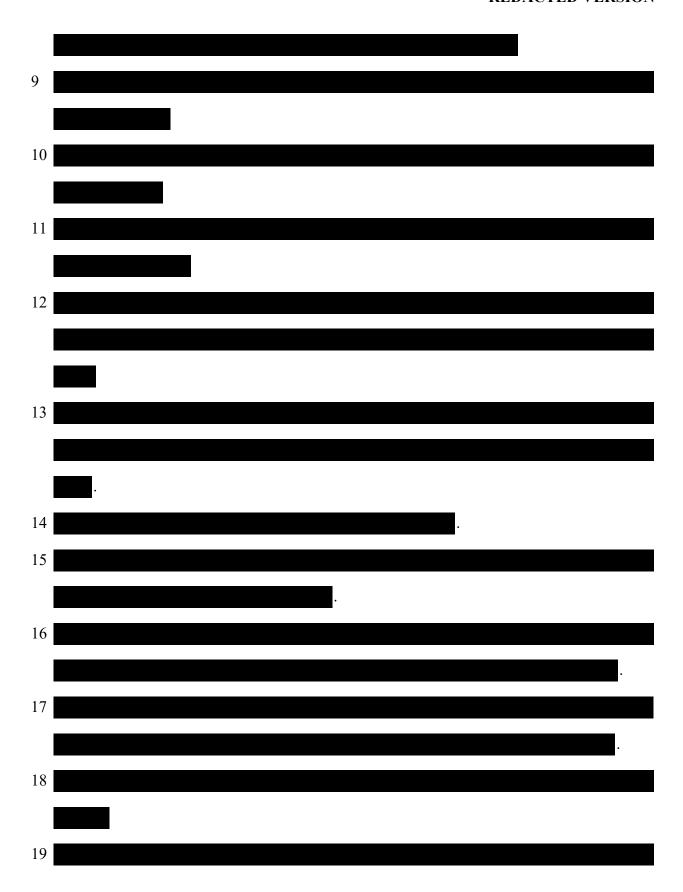
Arconic provides this early trade secret identification for informational purposes and despite the absence of any obligation to do so. Arconic's investigation is not complete, and Novelis has yet to submit to any discovery. In fact, when Arconic described Novelis' request as an interrogatory to identify trade secrets with specificity, even before discovery had officially been served, Novelis' counsel did not disagree. Arconic agrees to do so now because Novelis' counsel has made clear that it was "not suggesting for a minute that once the playing field is set, once we know what the trade secrets are, that there won't be full and complete discovery" including "much of what" Arconic requested on an expedited basis. Arconic wants to move the ball forward under the understanding, as represented by Novelis' counsel, that "it's not to say that you can't identify other [trade secrets] later, if you uncover that during discovery" and "if down the road you uncover what you think was a trade secret that you didn't know before you can move" for preliminary injunctive relief. Thus, Arconic reserves the right to supplement this list at any time without limitation.

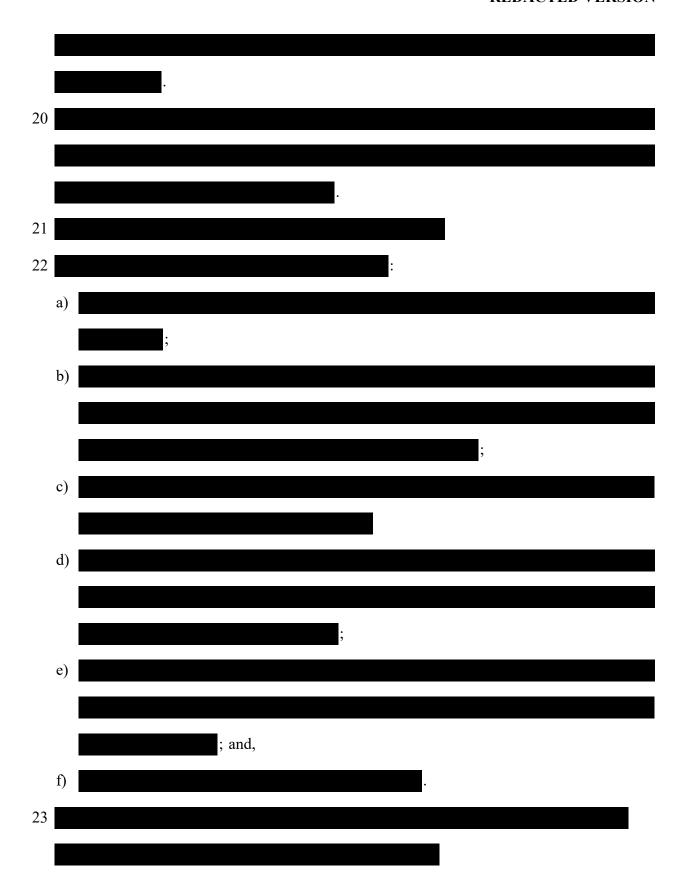
Subject to and without waiving these or other general objections identified in response to future interrogatories, Arconic alleges that its trade secrets in this suit include at least the following:



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REDACTED VERSION







January 22, 2018

Respectfully submitted,

<u>s/ Mark A. Klapow</u>

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 22, 2018, the foregoing was

electronically filed and served upon counsel for the Defendants through the Court's ECF system:

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